

COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
South Central Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Dominion Resources, Inc.
5000 Dominion Boulevard, Glen Allen, Virginia
Permit No. SCRO30859

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Dominion Generation has applied for an administrative amendment to the Title V Operating Permit for its Altavista facility. The Department has reviewed the application and has prepared a proposed Title V Operating Permit.

Engineer/Permit Contact:_____

Date: April 12, 2004

Air Permit Manager:_____

Date: April 12, 2004

Regional Director:_____

Date: April 12, 2004

FACILITY INFORMATION

Permittee

Dominion Resources, Inc.
5000 Dominion Boulevard
Glen Allen, VA 23060

Facility

Altavista Power Station
104 Wood Lane
Altavista, VA 24517

AIRS ID No. 21-031-0156

SOURCE DESCRIPTION

Dominion-Altavista Power Station (APS) manufactures electricity and is covered by Standard Industrial Code 4911. At maximum capacity, APS produces 55,000 lb/hr of process steam. The power station operates two, 382.5 MM Btu/hr coal-fired stoker boilers with associated coal, wood, lime, ash, and fuel oil handling systems. APS is a major source of NO_x emissions and the primary boilers are subject to the federal NO_x Budget Trading Program. As of August 29, 2003, the APS received approval by DEQ for their continuous emission monitoring system strategy for calculating NO_x emissions. As a result, the specific applicable requirements of the NO_x budget program are incorporated into the Title V permit.

The regulation allows the use of the minor modification procedure to add these new regulatory requirements. The NO_x Budget Trading program becomes effective May 31, 2004.

COMPLIANCE STATUS

The last inspection conducted at the facility by the Virginia Department of Environmental Quality (on April 24, 2003) indicates compliance with the PSD permit dated January 9, 2003 and the regulations.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units affected by the NO_x trading program are two, 382.5 MMBtu/hr "primary", stoker coal boilers (Unit ID 001, 002). These units are operated for the purpose of generating electricity. Both boilers are electrical generating units that were installed prior to 1999. As a result, the facility is required to measure and report the actual NO_x emissions, and have planned to use an existing continuous emission monitoring system (CEMs). The CEM is set up to monitor NO_x, CO, and SO₂ emissions from each boiler. A continuous opacity monitor is also used to measure the opacity from the boiler's combined exhaust.

EMISSIONS INVENTORY

A copy of the 2002 Comprehensive Environmental Data System (CEDS) annual emission update was submitted in May of 2003.

EMISSION UNIT APPLICABLE REQUIREMENTS - [001, 002]

Limitations

The following Virginia Administrative Code and New Source Performance Standards have specific emission requirements have been determined to be applicable:

9 VAC 5-140-10 et.seq., NO_x Budget Trading Program (permit requirements, compliance certification, allowance allocations and transfers, tracking, monitoring, reporting, opt-in process, and account representatives) See attached permit for source specific limitations.

NO_x BUDGET TRADING PROGRAM REQUIREMENTS

This section represents the NO_x Budget Trading permit, as required by 9 VAC 5-140-200 A, for each NO_x Budget source required to have a federally enforceable permit. A monitoring system has been installed for the NO_x Budget unit (Unit ID 001 and 002) for monitoring NO_x mass emission in accordance with Subpart H of 40 CFR Part 75. The monitoring system has been certified under the procedures of 40 CFR Part 75 before the required date of May 1, 2003. Recording and reporting of NO_x emissions are required to be done in accordance with the requirements of 9 VAC 5 Chapter 140, 40 CFR Part 75, and 40 CFR Part 97.

STREAMLINED REQUIREMENTS

None associated with this minor permit modification.

INSIGNIFICANT EMISSION UNITS

No additional insignificant emissions units identified.

PERMIT SHIELD & INAPPLICABLE REQUIREMENTS

No inapplicable requirements have been identified.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110, that apply to all Federal operating permit sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

COMPLIANCE PLAN

N/A

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

The administrative corrections to this Title V permit as well as the inclusion of applicable NO_x Budget conditions do not require a public participation period per 9 VAC 5-80-200 B.2., and 9 VAC 5-80-210 D.

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STATEMENT OF LEGAL AND FACTUAL BASIS

Addendum to the Statements of Legal and Factual Basis dated May 28, 2003 and April 12, 2004

Dominion Generation
5000 Dominion Boulevard, Glen Allen, Virginia
Permit No. SCRO30859

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Dominion Generation has applied for a minor modification of the Title V Operating Permit for its Altavista facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact: _____ Date: December 6, 2005

Thomas H. Berkeley, PE
(434) 582-5120 ext. 6005

Air Permit Manager: _____ Date: _____

David J. Brown

Regional Permit Manager: _____ Date: _____

Thomas L. Henderson

FACILITY INFORMATION

Permittee

Dominion Generation
5000 Dominion Boulevard
Glen Allen, VA 23060

Facility

Altavista Power Station
104 Wood Lane
Altavista, VA 24517

County-Plant Identification Number: 51- 031-00156

SOURCE DESCRIPTION

Dominion-Altavista Power Station (APS) manufactures electricity and is covered by North American Industrial Classification System code 221112- Fossil Fuel Electric Power Generation. At maximum capacity, APS produces 55,000 lb/hr of process steam. The power station operates two, 382.5 MM Btu/hr coal-fired stoker boilers with associated coal, wood, lime, ash, and fuel oil handling systems. These primary boilers are subject to the Acid Rain program and the federal NO_x Budget Trading Program.

MINOR MODIFICATION PERMIT INFORMATION

The current minor modification to the facility's Title V permit is being generated to incorporate the renewal of the Altavista Power Station's Title IV, Phase II, Acid Rain permit.

The facility is a Title V major source of Sulfur Dioxides, Nitrogen Oxides, Carbon Monoxide, and Sulfuric Acid Mist. This source is located in an attainment area for all pollutants, and is a PSD major source. The facility was previously permitted under a PSD Permit issued on February 21, 1990, and that permit was most recently amended on November 5, 2003.

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, has been conducted. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The Statement of Basis dated May 28, 2003 is for the initial Title V permit for the Altavista Power Station, and the Statement of Basis dated April 12, 2004 is for the minor modification to the initial Title V permit by which the NO_x Allowance Budget Trading applicable requirements were added. The emission units and control devices at the Altavista Power Station remain as described in the Statements of Basis dated May 28, 2003, and April 12, 2004.

EMISSIONS INVENTORY

A copy of the 2004 annual emission update attached. Emissions are summarized in the following tables.

2004 Actual Emissions				
Criteria Pollutant Emission in Tons/Year				
VOC	CO	SO ₂	PM ₁₀	NO _x
5.01	401.46	81.10	18.61	549.73

2004 Facility Hazardous Air Pollutant Emissions	
Pollutant	Hazardous Air Pollutant Emission in Tons/Yr
Lead	0.04
Chlorine	20.14
Hydrochloric acid	7.70
Hydrogen fluoride	0.96

EMISSION UNIT APPLICABLE REQUIREMENTS

The emission unit applicable requirements for the APS remain as described in the Statements of Basis dated May 28, 2003, and April 12, 2004.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

FUTURE APPLICABLE REQUIREMENTS

None associated with this minor permit modification.

INAPPLICABLE REQUIREMENTS

None identified

COMPLIANCE PLAN

Not applicable

INSIGNIFICANT EMISSION UNITS

No changes in insignificant units are associated with this minor permit modification.

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

Per 9 VAC 5-80-210 D, Title V minor modifications do not require public participation, but they do require notification of affected states and the EPA administrator. In SCRO's letter dated September 29, 2005 the North Carolina division of air quality was notified of receipt of the permit application as required. Likewise, in a similar letter of the same date, EPA Region III was notified of the permit application.

On October 19, 2005 SCRO submitted the PROPOSED minor modification to EPA Region III. SCRO received no comments during EPA's 45 day review period which ended on December 5, 2005. Therefore, in accordance with 9 VAC 5-80-210 E, DEQ may issue the final permit modification.